

AARON D. FORD
Attorney General
DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney General
State of Nevada
100 N. Carson Street
Carson City, Nevada 89701-4717
Tel: (775) 684-1150
E-mail: drands@ag.nv.gov

AARON D. FORD
Attorney General
NATHAN M. CLAUS, Bar No. 15889
Deputy Attorney General
VICTORIA C. COREY, Bar No. 16364
Deputy Attorney General
State of Nevada
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
Tel: (702) 486-7629 / (702) 486-9245
Email: nclaus@ag.nv.gov / vcorey@ag.nv.gov

*Attorneys for Defendants Rama Akash,
Adam Burnside, Frank Dreesen,
Jo Gentry, Brian Kerby, John King,
Timothy Knatz, Joseph Kobrick,
Gillian Lambey, Ana Leos,
Rashonda Smith, and Elvin Worthey*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CURTIS L. DOWNING,

Plaintiff,

vs.

JO GENTRY, et al.,

Defendants.

Case No. 2:16-cv-02632-RFB-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND THE DEADLINE
TO FILE THE JOINT PRE-TRIAL
ORDER**

Plaintiff Curtis L. Downing, and Defendants, Rama Akash, Adam Burnside, Frank Dreesen, Jo Gentry, Brian Kerby, John King, Timothy Knatz, Joseph Kobrick, Gillian Lambey, Ana Leos, Rashonda Smith, and Elvin Worthey by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, Douglas R. Rands, Senior Deputy Attorney General, Nathan M. Claus, Deputy Attorney General, and Victoria C. Corey, Deputy Attorney General, hereby submit their stipulation and agreement to extend the deadline for the filing of their Joint Pre-Trial Order and respectfully request that the Court

1 extend the deadline to file a proposed joint pretrial order to June 10, 2024. The Parties are
2 requesting the modification in good faith and the request is supported by good cause.

3 LR 26-3 requires that the extension of any date set by the discovery plan,
4 scheduling order, or other order must—as well as satisfying the requirements of LR IA 6-
5 1 to explain the reasons an extension is needed—demonstrate good cause for the
6 extension.

7 Good cause to extend the deadline to file a proposed joint pretrial order exists.
8 Plaintiff has been unable to completely review the proposed Joint Pretrial Order and will
9 need a week to complete his review. Plaintiff and Defense Counsel have been working
10 well together and believe they can continue working together to attempt to streamline
11 this trial and potentially stipulate to evidence, facts, and potential witnesses.

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Based on the foregoing, the Parties submit that good cause exists to grant the requested extension and that the deadline to submit a proposed joint pretrial order be moved to June 10, 2024.

DATED this 3rd day of June, 2024
and respectfully submitted by:

AARON D. FORD
Attorney General

/s/ Nathan M. Claus

DOUGLAS R. RANDS, Bar No. 3572
VICTORIA C. COREY (Bar No. 16364)
NATHAN M. CLAUS (Bar No. 15889)
555 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101
nclaus@ag.nv.gov

Attorneys for Defendant

DATED this ____ day of June, 2024
and approved as to form and content by:

/s/ Curtis Downing
CURTIS DOWNING

Plaintiff

IT IS SO ORDERED:

Deborah Weber
UNITED STATES MAGISTRATE JUDGE

Dated: June 4, 2024

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on _____ 2024, I electronically filed the foregoing, ***, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, addressed to the following:

Curtis Downing, #18675
Southern Desert Correctional Center
P.O. Box 208
Indian Springs, Nevada 89070

An employee of the
Office of the Attorney General